

Appendix I

<p>FPC-DE FILE: XX-XXXXX SAFETY OFFICE</p>	<p>APPENDIX I</p> <p>Excerpted from: WORK INSTRUCTION SA - 21 - 03 E, H & S INCIDENT MANAGEMENT</p>	<p>Page 1 of 7</p> <p>CONFIDENTIAL</p>
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6.2 Non-Compliance Release and Permit Deviation Reporting

A non-compliance release for the purposes of this procedure is an unpermitted incident in which a gas is released or a liquid is spilled. Such incidents that meet or exceed the Reportable Quantity (RQ) include a release of VCM greater than or equal to 1 pound, a spill of caustic or sulfuric acid greater than or equal to 1,000 pounds, and a spill of VAM greater than or equal to 5,000 lbs.

[REDACTED]

[REDACTED]

[REDACTED]

A permit deviation for the purpose of this procedure is one that must be reported to DNREC as soon as possible. This would include deviations such as missed batches and RVCN averages greater than the permit limits.

6.2.1 Reporting Non-Compliance Release in Excess of the RQ

Employees involved in or witnessing a suspected Non-Compliance Release in excess of the reportable quantity shall notify their Supervisor immediately and complete a Witness Report. The Supervisor will then make the necessary calls to the agencies immediately when, but no later than fifteen minutes after, he has knowledge of a RQ release (see attachment J). The Supervisor may assign this task to an operator or other qualified individual if conditions warrant. Use SA2103 C1 "Environmental Incident Case Management Checklist" to document notifications.

As soon as practicable after the release, the Environmental Department shall provide a written follow-up emergency notice to DNREC and the LEPC.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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Approved By: Plant Manager

Revised Date: 1/12/05
Effective Date: 8-15-95

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6.2.2 Non-Compliance Release of "Unknown Quantity" Incident Reporting

A non-compliance release for which the quantity of the gas emitted or liquid spilled cannot be immediately determined. For example, a pinhole-sized leak is observed in a pipe in a pipe rack holding 15 pipes that is located 20 feet off the ground.

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Approved By: Plant Manager

Revised Date: 1/12/05
Effective Date: 8-15-95

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[REDACTED]

6.2.2.2 Reporting an "Unknown Quantity" Incident

Employees involved in or witnessing a suspected Non-Compliance Release for which the quantity can not be immediately determined to exceed the RQ shall notify their Supervisor immediately and complete a Witness Report. If the quantity of the chemical being emitted/spilled can not be determined within 10 minutes, the incident should be reported as a potential RQ release event, with the quantity reported as "UNKNOWN". The supervisor will make the necessary calls to the agencies within 15 minutes for any incident for which the quantity of a CERCLA/EPCRA regulated chemical being emitted or spilled is unknown (see Attachment J "Agency Reporting LIST"). The supervisor may assign this task to an operator or other qualified individual if conditions warrant. Use SA2103 C1 "Environmental Incident Case Management Checklist" to document notifications. This checklist should accompany investigation paperwork.

As soon as practicable after the release, the Environmental Department shall provide a written follow-up emergency notice to DNREC and the LEPC.

[REDACTED]

[REDACTED]

6.2.3 Reporting Non-Compliance Release of Non-reportable Quantity

A non-compliance incident in which the gas emitted or liquid spilled does not exceed the CERCLA/EPCRA reportable quantity threshold ("non RQ") for the chemical. For example, a pinhole sized leak emitting less than 1 pound of VCM is observed at a connector weld.

[REDACTED]

Maintained By: Safety Manager
Approved By: Plant Manager

Revised Date: 1/12/05
Effective Date: 8-15-95

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6.2.5.4 Summary of Recommendations

[REDACTED]

[REDACTED]

[REDACTED]

_____ ne

[REDACTED]

[REDACTED]

[REDACTED]

6.2.5.6 Distribution of Approved Incident Investigation Report

[REDACTED]

6.2.6 Communication of Incident

[REDACTED]

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6.2.7 Implementation of Preventive Actions

6.2.8 Documentation of Preventive Action Completion

6.2.9 Reporting of Preventive Action Status

6.2.10 Notification to Agencies

Notification of incidents shall be made in accordance with the all applicable Federal and State regulations. See Attachment J.

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